

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

REED BEIDLER,)	Case No. 1:25-CV-06074
)	
Plaintiff,)	Hon. Edmond Chang
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

Joint Status Report

Pursuant to the Court’s minute entry at Doc. No. 30, Plaintiff Reed Beidler and Defendant United States of America (together, the “Parties”) submit the following Joint Status Report.

On August 11, 2025, the Court entered an order extending the deadline for the United States to answer the complaint, and resetting the case deadlines in this matter (Doc. No. 19). On September 30, 2025, the United States filed its answer to Count I of the complaint (Doc. No. 22), and separately moved for the dismissal of Count II of the complaint for lack of jurisdiction based on sovereign immunity (Doc. No. 20). Plaintiff filed his response in opposition to the motion on October 21, 2025 (Doc. No. 28). As originally set, the Court ordered the United States to file its reply by November 4, 2025 (Doc. No. 23).

As a result of a lapse in federal appropriations, the Court entered Amended General Order 25-04, which suspended and held in abeyance, as of October 1, 2025, all civil litigation involving the United States as a party (Doc. No. 25). On November 14, 2025, the Court entered General Order 25-28, lifting the stay and extending by 49 days all deadlines in affected civil cases including, but not limited to, any scheduled discovery and pleading dates (Doc. No. 31). However, since the deadline to issue the first round of written discovery will occur immediately after the new year,

(January 5, 2026), the Parties respectfully request the deadline be amended to January 30, 2026.

Accordingly, the Parties seek entry of an order resetting existing case deadlines, as follows:

The parties shall serve Rule 26(a)(1) disclosures by December 3, 2025.

The United States shall file its reply brief in support of its motion to dismiss, by December 23, 2025.

The first round of written discovery requests shall be issued by January 30, 2026.

The deadline to add parties or amend pleadings shall be March 23, 2026.

Fact discovery shall close by October 22, 2026.

Signatures:

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November 2025, the foregoing document was filed electronically using the Court's ECF system. The filing is available for viewing and downloading from the ECF system.

/s/ Mary A. Stallings

MARY A. STALLINGS

Trial Attorney

United States Department of Justice, Tax Division